

# Colorado Stationary Sources Program



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# Colorado Program

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- **Organizational Structure and FTE**
- Types of Permits
- Types of sources/inventory
- Budget
- Funding structure
- Administrative controls
- Past problems and lessons learned



# Organization Structure

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- (See organizational chart)
- Approximately 150 FTE in Air Division
- 68 FTE in Stationary Sources Program
- 11.6 FTE in Construction Permit Unit
- 5 FTE in Operating Permit Unit
- 15 FTE in Field Services (plus locals)
- 7 FTE in Inventory and Support



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# Permit Types

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- Major Sources
  - Title V
    - Approx. 188 total
    - 35-50 modifications/year
    - 50-60 renewals



# Permit Types

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- PSD
  - Approx. 2-4 applications/year
- NANSR
  - Zero/year



# Permit Types

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- Minor Sources
  - True minors
    - Approx. 3,300 total in inventory
    - Approx. 1,300-1,600/year (new, mods. Administrative changes)
  - “Synthetic” minors
    - Approx. 800-900 total in inventory
    - Approx. 50-150/year new and mods.



# Permit Metrics

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- Title V: approx. 27-37 sources per engineer
- Minor NSR (all permit actions): 125-130/ engineer; 6-12 hours each
- PSD: 150- 500 hours each??
- Avg. time per Title V permit: 30-500 hours





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- **Types of sources - inventory**
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# Types of Sources/Inventory

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- Air Pollutant Emissions Notice (APEN)
  - Required of all sources above de minimis levels
  - Update required every five years, or if source is modified
  - Used to build a SIP inventory, and for annual fees assessments



# Types of Sources/Inventory

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- Approximately 6,600 sources in the inventory
- Largest source types: gas stations (1,500); oil and gas (1,200); mining (1,300); MACT, drycleaners (430)
- Largest emissions: electric utilities



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# Budget

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- Division
  - Cash – \$11 mil.
  - Federal – \$3 mil.
- Stationary Sources
  - Cash – \$5.6 mil.
  - Federal - \$1.5 mil.



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# Budget

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- Sources of Fees
  - Annual emissions – \$4.1 mil.
  - Hourly permit processing – \$1 mil.
  - APEN - \$235K
  - Misc. - \$600K



# Budget

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## Fee Structure:

- APENs - \$119.96 each
- Annual Emissions
  - Criteria pollutants - \$17.97
  - HAPs - \$119.96
- Hourly - \$59.98





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# Administrative Controls

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- Examples:
  - Workplan (Division and EPA-PPA)
  - Performance Plans
  - Information management
  - (Budget and accounting)



# Administrative Controls

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- Annual workplan
  - Connects activities to air quality goals, legislative appropriation/FTE, and EPA-required work
  - All activities are listed along with due dates
  - Staff time – personnel matrix



# Administrative Controls

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- Performance plans
  - Linked to workplan
  - Rating directly connected to work completed
  - Pay for performance



# Administrative Controls

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- Information Management
  - Permit tracking – NSR and OP
  - Billing module
  - Emissions/inventory module
  - CACTIS (inspections, source reports, enforcement, etc.)



# Problems and Lessons Learned

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- Permit Backlog – legendary!
  - Approx. 500 “initial” NSR permits
  - Approx. 1,800 “final” NSR permit
- Obtained 4 new FTE for two years
- Revised performance plans
- Permit tracking system
- Contractor efficiency study



# Problems and Lessons Learned

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- Compliance program – quantity and quality issues
  - Contractor study to examine options
    - More training
    - Revise inspection targeting approach
    - Use source-submitted reports
    - Assess role of local agencies in completing complex work
    - Revise performance plans



# Problems and Lessons Learned

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- Information management – 24 separate databases that did not link together
  - Hired contractor to help develop clear vision of needs
  - Built an integrated system connecting source inventory, permitting, billing, compliance and enforcement.





# Problems and Lessons Learned

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- Funding – adequacy of fee structure
  - No increase in 7 years
  - Decision point: state or EPA program?
  - State program preferred
  - Decision point: how much of an increase?
  - Financial analysis performed
  - Approximately 20% provided plus data system funding



# Problems and Lessons Learned

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- Staffing – turnover and training
  - A constant issue
  - State pay approximates private industry
  - Provide training as opportunities arise



# Problems and Lessons Learned

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- Summary of Efficiency Measures
  - Improved procedures for Title V and NSR
  - Use permit templates for common permits
  - Applied flexibility options for Title V, e.g., alternative operating scenarios
  - Maximum use of Synthetic Minor permits
  - Aggressive SBA program, including MACT
  - Allow “self-certification” for NSR permits
  - Conduct simple inspections by telephone



# Problems and Lessons Learned

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- Summary of Efficiency Measures
  - Make better use of submitted reports
  - Allow joint processing of NSR and Title V permit actions
  - Be flexible in moving staff
  - Increase billable hours for permitting
  - Develop data system that support underlying business operations
  - Provide staff incentives – leave, awards, pay